



HARRIS, WILTSHIRE
& GRANNIS LLP

May 31, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket
No. 09-197

Dear Ms. Dortch:

This letter supplements the notice of ex parte filed by Q Link Wireless, LLC (“Q Link”) on May 25, 2018. At the meetings referenced in the notice, representatives of Q Link left behind a document titled “Q Link Wireless Supplemental Information.” That document is enclosed herein, following a copy of the May 25, 2018 letter.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'John T. Nakahata'.

John T. Nakahata
Counsel to Q Link Wireless, LLC

cc: Jay Schwarz
Kevin Costello
Travis Litman
Trent Harkrader

Enclosure

May 25, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
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Re: *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket
No. 09-197

Dear Ms. Dortch:

On May 23, 2018, Issa Asad, Chief Executive Officer of Q Link Wireless, LLC (“Q Link”), Paul Turner, President of Q Link, Rafael Carvajal, Chief Operating Officer of Q Link, and I and Shiva Goel, counsel for Q Link, met separately with Jay Schwarz, Wireline Advisor to the Chairman, Kevin Costello of the Chairman’s office, Travis Litman, Chief of Staff to Commissioner Rosenworcel, and Trent Harkrader, Associate Bureau Chief, Wireline Competition Bureau about the above-referenced proceeding.

We discussed a flaw in USAC’s technical implementation of the National Verifier that could disconnect millions of rural Americans from the enrollment process—and a safe, secure, and simple fix to the problem.¹ If left uncorrected, this flaw will effectively deny access to mobile wireless broadband Lifeline services to millions of low-income Americans in rural areas, including in states such as Michigan, Ohio, Kentucky, Missouri, Louisiana, Texas, Pennsylvania, Georgia and West Virginia where Q Link provides a substantial number of rural households with 1 GB of data and unlimited calling through the Lifeline program. Without a change, Q Link will be unable to serve low-income consumers in these areas, as it does today. We urged the Commission to direct USAC to fix this flaw prior to “hard launch” of the National Verifier later this year.

When creating the National Verifier, the FCC and USAC recognized the critical importance of allowing consumers to enroll online. That is why USAC developed a consumer portal that would allow consumers to obtain proof of verification directly online. The FCC and USAC also recognized the consumer portal could be difficult for many consumers to navigate on their own, and thus developed a separate portal for agent-assisted eligibility verification through the National Verifier. Indeed, when USAC initially presented its concept for the National Verifier to industry, its schematics included plans for machine-to-machine interfaces (i.e. application programming interfaces, or APIs) that would have permitted carrier-assisted, online

¹ The presentation Q Link used at the meetings is attached to this letter.

verification and enrollment of Lifeline consumers.² Those schematics were consistent with the Commission’s order directing the creation of the National Verifier, which contemplated an “interface . . . geared toward providers that may allow application programming interfaces (machine-to-machine interaction).”³

However, when USAC announced its final National Verifier design last year, the APIs to permit carrier-assisted online consumer eligibility verification and enrollment had disappeared. In other words, as USAC’s plans currently stand, the National Verifier would permit consumer online eligibility verification if the consumer can navigate that process without the carrier, and it would permit carriers using agents to have the agents assist consumers with eligibility verification and enrollment, but it will not support both online eligibility verification and carrier assistance to consumers *at the same time*. This is fundamentally irrational, and cannot be based on any discernable technical or network security grounds.

The result is a system that abandons rural low-income Americans, who have far less access to in-person assistance and disproportionately depend on web-based enrollment. Without APIs, ETCs will be unable to provide remote assistance to consumers as they navigate the National Verifier’s online verification process through the consumer portal, which they must do *before* they can then enroll with a Lifeline carrier. Without APIs, a customer seeking to sign up online will have to navigate the National Verifier’s verification process on his or her own only to *repeat* the same cumbersome process with the carrier, who would still have to collect and verify the customer’s information. That kind of clunky, 90s-era redundancy is unheard of on the internet in 2018, and would erect yet another barrier to rural broadband access. Slide 7 in the attached presentation shows just how difficult this multistep process will be for consumers, especially if their eligibility cannot be confirmed simply through a database dip, but requires the submission of additional documentation. Under the current National Verifier implementation, ETCs would be able to assist customers only in-person, utilizing sales agents that cannot be economically dispatched to lightly-populated rural communities.

Q Link’s experience demonstrates the enormous stakes of this issue for rural America. Q Link has emerged as the largest wireless Lifeline provider to rural America by leveraging online enrollment. 67 percent of Q Link customers reside in rural or suburban areas, and Q Link has a *rural* customer base of at least 20,000 in ten states (Georgia, Kentucky, Indiana, Louisiana, Michigan, Missouri, Ohio, Pennsylvania, Texas, and West Virginia). 82 percent of Q Link’s customers are new to Lifeline, meaning they were previously unserved by other ETCs.

² See Attachment at p.3; *see also* Letter from John T. Nakahata to Marlene H. Dortch, Secretary, FCC, WC Docket No. 11-42 (filed Sep. 8, 2017); Letter from John T. Nakahata to Marlene H. Dortch, Secretary, FCC, WC Docket No. 11-42 (filed Aug. 10, 2017).

³ See *Lifeline & Link Up Reform & Modernization*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, 4012 ¶ 139 n.390 (2016); *see also id.* ¶¶ 137-39; Attachment at p.2.

The reason Q Link penetrates underserved rural markets so effectively is that it reaches customers where they live and work rather than at distant retail locations. Q Link allows customers to sign up for service wherever they can access an internet connection, such as at work, a library, or at a friend's house. It performs a robust series of screens to ensure that applicants have coverage, are who they say, and are eligible. It works with customers that have questions over the phone and by email, fielding more than one million calls per month and having sent more than 150 million support emails. It allows customers to submit documentation online, mails self-addressed stamped envelopes when necessary to collect verification documents, and has established relationships with services such as UPS to allow consumers to use fax machines at UPS Stores to send documentation, with the charges billed to Q Link. Q Link does not depend on on-site personnel to perform any these functions, a model that may work in some parts of the country, but has its limits in sparsely populated or remote rural areas where sales agents just cannot make sales. Yet the entire process depends on APIs that allow Q Link to integrate verification and service enrollment.

The good news is that there are ready technical solutions that would make it relatively easy, with a minimum amount of additional development time (Q Link estimates 20 hours), to develop these APIs to permit online, carrier-assisted eligibility verification and enrollment in a single, non-mandatory carrier process. With APIs, this carrier-assisted online process would reduce opportunities for fraud and reduce costs, without any impact on network security.

For example, with carrier APIs, USAC can ensure that the applicant—and not the carrier or its agent—attests to identity and eligibility information using off-the-shelf tools like DocuSign or 3D Secure. These services enable secure, authenticated virtual signatures handled by servers operated by either USAC or USAC-selected trusted third parties, not ETCs. Because USAC would control the certification language being presented to the consumer and directly obtains the consumer's signatures, without carrier intervention, USAC can be sure that it is the consumer that is signing the form, not any carrier personnel. In contrast, under the carrier-assisted in-person enrollment process that USAC is currently implementing, the verification system relies on the agent's good faith that the applicant, and not the agent, is the party signing the certifications.

Moreover, by credentialing and authenticating carriers that are allowed to transact with USAC using an API—a step that USAC already does for NLAD—USAC can ensure that there is no impact on the National Verifier's network security. USAC will also be able to strip individual ETCs of online access if they are found to be abusing the system.

The low upfront costs of developing carrier APIs can be recovered by charging the carrier a per-transaction fee or through a similar mechanism, and would be dwarfed by the cost savings to USAC because enabling greater carrier assistance for online eligibility verifications and enrollments will reduce the load on USAC's customer service operations for the National Verifier. As discussed, the burden of handling customer inquiries and interactions are enormous, and USAC will bear those burdens alone in the current National Verifier implementation. Allowing carrier-assisted automated online enrollments will allow those carriers that wish to do

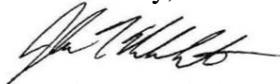
Marlene H. Dortch
May 25, 2018
Page 4 of 4

so to continue to be the front-line interface with consumers, shifting the bulk of that customer interface burden from USAC to the ETC for customers that wish to sign up for service online. Carrier APIs also would reduce the load on the National Verifier substantially by allowing the ETC to conduct an initial filter of applicants that are ineligible. Indeed, in Q Link's experience, a very high percentage of interested customers ultimately prove ineligible; Q Link alone has filtered more than 30 million ineligible leads.

Q Link has never been able to determine why the APIs were removed from the National Verifier implementation plan last year. No one with whom we have spoken at USAC or at the Commission seems to know who decided to remove APIs or why that was done. At this juncture, we urge that APIs be restored to the National Verifier design and be implemented by "hard launch" of the National Verifier.

Please contact me if you have any questions.

Sincerely,



John T. Nakahata
Counsel to Q Link Wireless, LLC

cc: Jay Schwarz
Kevin Costello
Travis Litman
Trent Harkrader

Attachments

ATTACHMENT

NATIONAL VERIFIER:

**CARRIER-ASSISTED ONLINE
ENROLLMENT VIA API NEEDED TO
SUPPORT RURAL CONSUMERS.**



EXECUTIVE SUMMARY

These are Q Link Wireless and Industry recommendations on how to (reasonably) quickly explain the fundamental concern regarding the removal of the National Verifier APIs. It has been clear in our conversations with TAPD, WCB and FCC staff that they haven't yet grasped the gravity of the API concern.

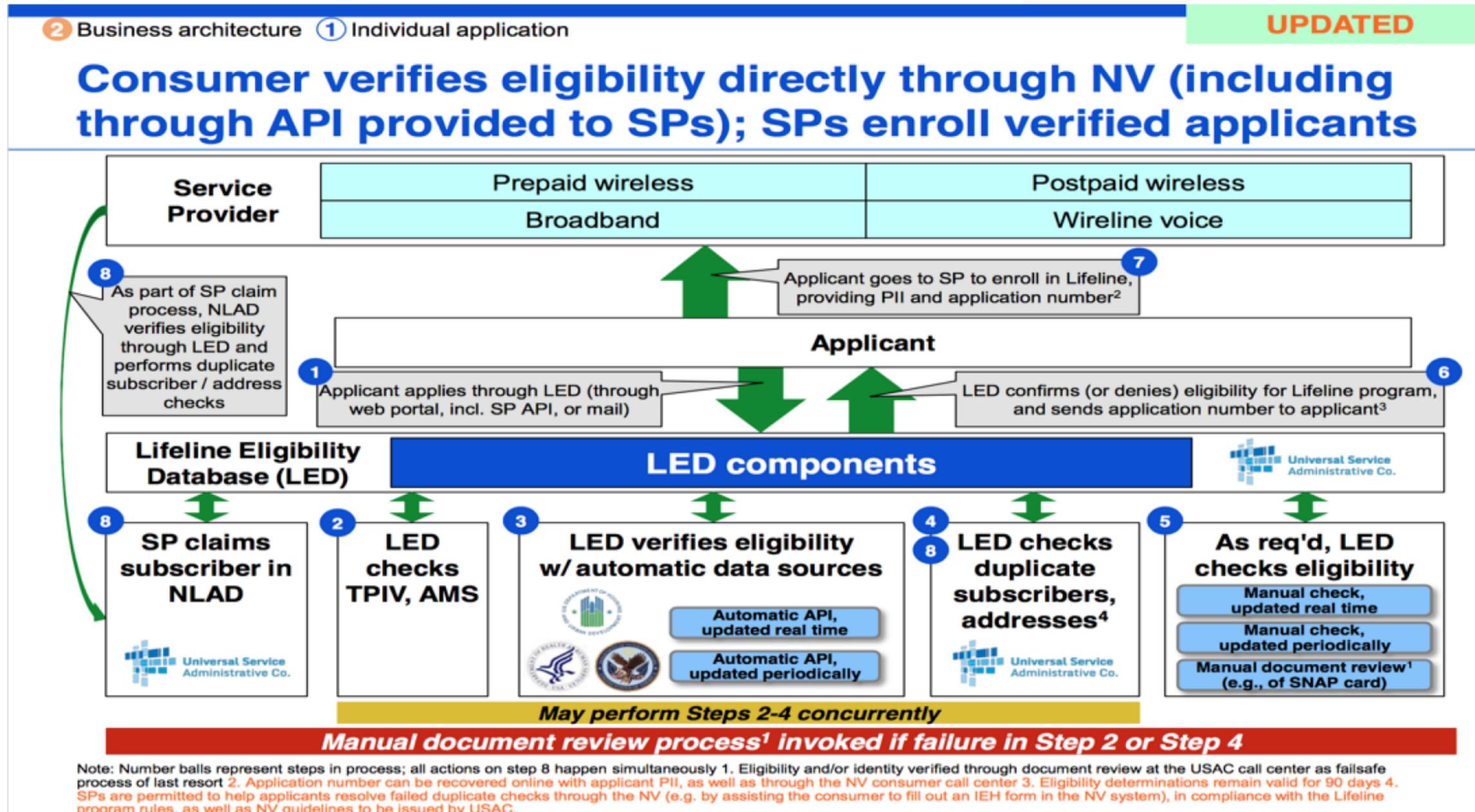
NPRM Paragraph 137 and 138 and n. 390 are particularly relevant to the use of an API for verification:

137. "Our objective is to provide multiple pathways to populate the LED with records associated with Lifeline eligible subscribers in order to simplify the enrollment process for subscribers and Lifeline providers. We therefore direct USAC to work with the Bureau to develop other efficient and reliable methods of listing eligible subscribers in the LED. Additionally, USAC must develop processes regardless of the pathway used, to obtain subscriber consent to the collection, retention, use, and sharing of a subscriber's personally identifiable information, including information about their use of Lifeline services with USAC, the National Verifier and other appropriate users. As described further below, the LEC will also maintain information about the supported services of the Lifeline providers.

138. Access by different users. The National Verifier will also function as an interface for authorized users for many different activities. We agree with commenters and anticipate that eligible subscribers, Lifeline providers, states, and Tribal Nations will require access to establish or verify eligibility. We also expect the National Verifiers to have varying interface methods to accommodate these different groups of users. [n. 390] We direct USAC to work with the Bureau to develop interfaces that promote the objectives of the National Verifier and service the needs of users in a cost-effective and efficient manner.

n. 390 For example, the National Verifier may have an interface that is consumer-friendly and geared towards subscribers. It may have another interface that is geared toward providers that may allow application programming interfaces (machine-to-machine interaction)."

OCTOBER 2016 ORIGINAL NV PLAN SUPPORTED APPLICATION VIA SP WHICH FOLLOWS FCC INTENTIONS



FACTS

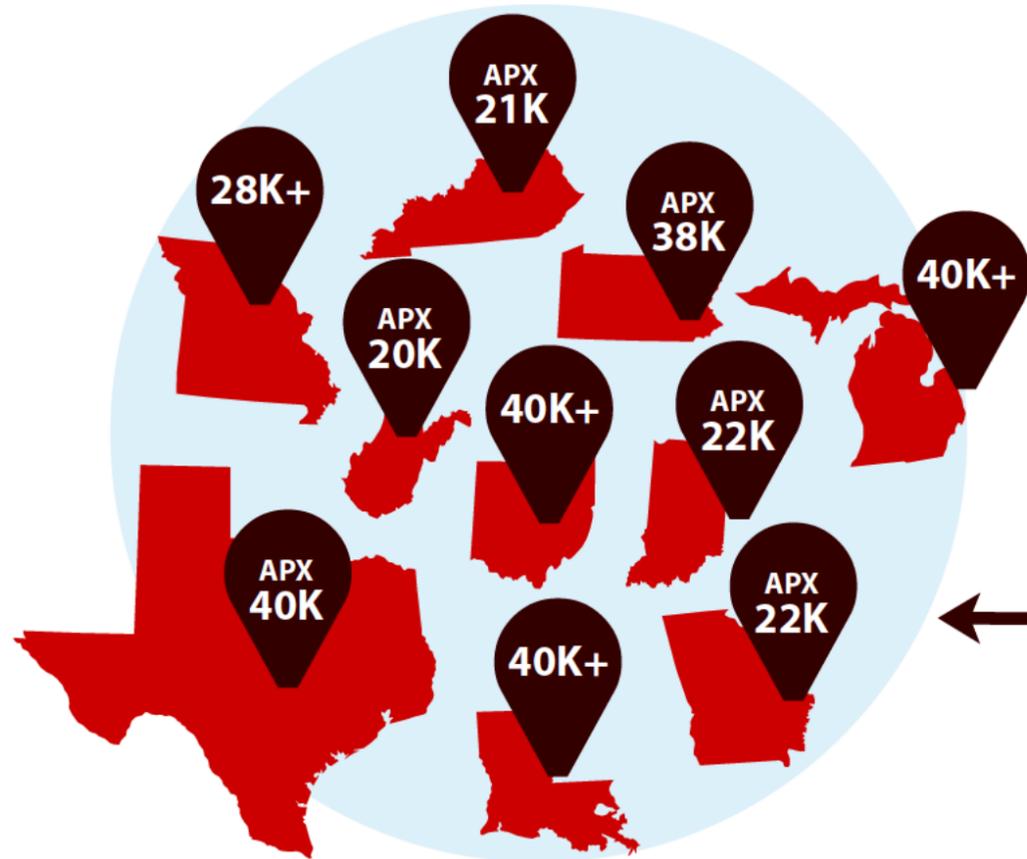
1. FCC and USAC have determined that both in-person and web-based enrollments are important to the future of the Lifeline Program. Hence, they've created an Agent portal for carrier-assisted, in-person enrollments (addresses 80% of current enrollments) and a consumer-direct portal for web-based enrollments (addresses <1% of current enrollments). They derailed the future of the carrier-assisted, web-based enrollment model (currently 30% of all enrollments) when they removed API connection to the NV for carriers; connections that have successfully existed between carriers and NLAD for over 4 years.
2. APIs have been the backbone of the web-based transaction economy for the past 15-20 years. They drive considerable efficiencies in customer experience and enhance cyber security by reducing the number of websites a prospect must visit to complete a transaction. They also allow a carrier to maintain connection with a prospect while information to complete the prospect's desired transaction is gathered from other websites/databases.
3. Lack of APIs will drive carriers away from serving the rural markets without the web engagement model at a time when they have dramatically increased broadband service offerings to underserved, low income urban and rural markets, at the request of the FCC.
4. Online marketing companies such as Amazon and eBay and Telecom providers like Sprint, AT&T, T-Mobile and Verizon will NOT send prospective customers to another website to make a payment. This would cause an overall loss in transactions, as prospects may not return to a company's secure website to complete the enrollment process or shipping details. Instead, these companies open an API connection to the payment processing company's platform and send the prospect's payment information to be validated, all while maintaining their session with the prospect. APIs provide this efficiency.
5. The new NV model proposes to break the above process by requiring the ETC, once they've spent the capital to engage a prospective LL applicant, to transfer that applicant to the NV's consumer-direct web enrollment portal and terminate their session with the applicant. From there, an applicant might not even return to the ETC's website to enter the credentials received from the NV. The failure-to-return rate for the ETC will raise the cost of this model considerably, but, more importantly, will create confusion for applicants who will now have to endure two separate, independent approval processes. Some will pass the NV screening but will not pass the ETC's screening. Consumer confusion will increase the cost of administrating the NV.
6. Restoring the APIs as originally planned by the FCC and USAC will provide a level playing field for all enrollment models (no wrong door) and support the expansion of broadband to lower income and rural America. It will also provide the National Verifier with the same complete visibility and control over the applicant's eligibility determination as does the Agent portal enrollment process under the NV.
7. To have a viable web-based transaction business, a company that invests capital in advertising and engagement must maintain connection with the prospect through completion of the transaction, or in this case, enrollment. It does not make financial sense for a company to invest in a fickle internet user just to hope he returns to their website after leaving it. This convoluted process will also cause a barrier to entry for rural consumers.

KEY MESSAGES

- 1 Online enrollment is important to serving rural areas, veterans, the disabled, the elderly and multi-language support.
- 2 The eligibility verification process is important, but shouldn't be a barrier to prevent enrollment from otherwise eligible users. A complicated process will be difficult for many consumers to navigate, especially if they are not validated through automated database checks.
- 3 The FCC/USAC has recognized that an online eligibility process is important to have.
- 4 Service Provider assistance is very important to successful consumer navigation of the eligibility process.
- 5 Including an API will support Service Provider assistance for online enrollment, without introducing fraud risks.
- 6 Existing solutions support consumer certifications directly on USAC's site or on a USAC-selected trusted third party.

ONLINE ENROLLMENT IS CRITICAL TO SERVING RURAL AREAS, VETERANS AND OTHER UNDER-SERVED COMMUNITIES

Q LINK WIRELESS IS THE LARGEST LIFELINE PROVIDER TO RURAL AMERICA



67%

OF Q LINK CUSTOMERS LIVE IN RURAL/ SUBURBAN AREAS

STATES WITH AT LEAST 20,000 RURAL Q LINK LIFELINE HOUSEHOLDS

Ohio, Michigan, Louisiana, Texas, Pennsylvania, Missouri, Indiana, Georgia, Kentucky, West Virginia



82% OF Q LINK CUSTOMERS ARE NEW TO THE LIFELINE PROGRAM



12% OF US POPULATION HAS SOME FORM OF DISABILITY (INCLUDES VETERANS)



21% OF APPLICANTS ARE OVER 55 YEARS OLD

2,000,000

NUMBER OF LIFELINE HOUSEHOLDS Q LINK CURRENTLY SERVES

100%

OF THESE SIGNED UP ONLINE



55 MILLION

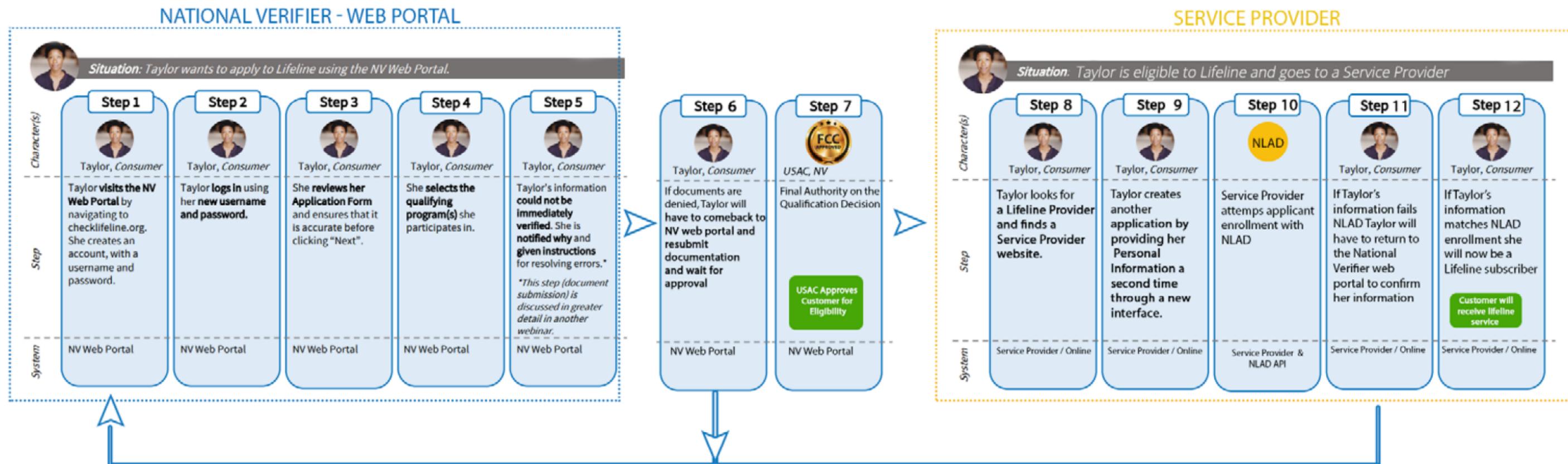
HISPANIC AMERICANS

(This population requires multi-language support)

COMPLEXITY OF SIGNUP WITH NO API

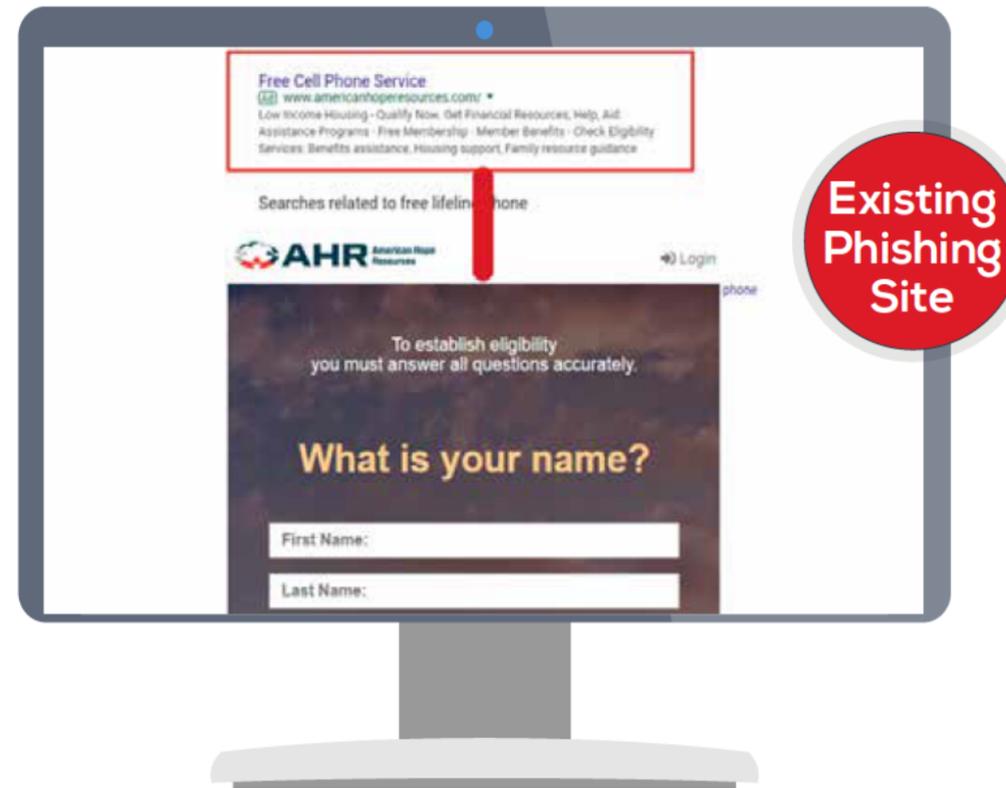
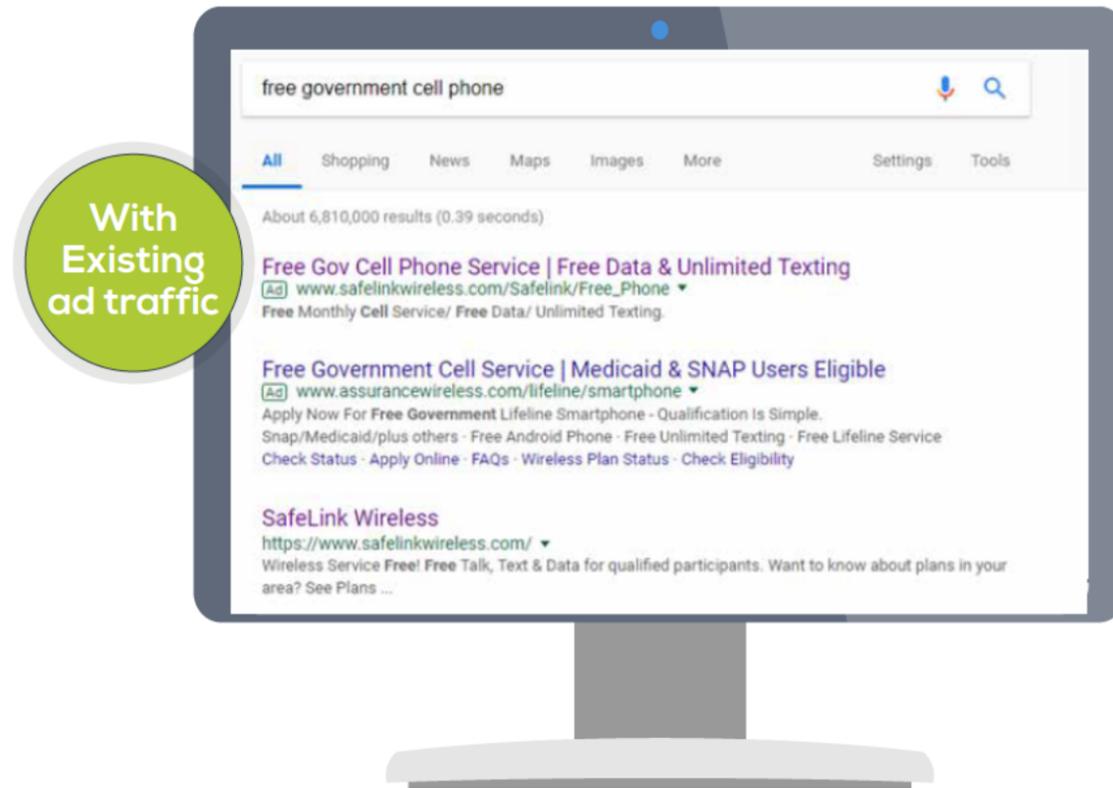
NV CONSUMER PORTAL + SERVICE PROVIDER ONLINE

- ! 2 sign up processes for the applicant, through the NV and Lifeline Service Provider, increases the user's workload. This is in defiance of <https://webstandards.hhs.gov/guidelines/15>
- ! Every application flows to the National Verifier where the user provides personally identifiable information and document proofs. If there are any questions that arise during the registration process, USAC will have to support these inquiries. Q Link sees ~1.7 million calls, ~12 million emails, and ~15,000 social media interactions per month, all to resolve customer inquiries.
- ! This process requires duplication of work for USAC and the Service Provider. USAC is inheriting approximately 38 times more work that the service provider will normally do by filtering applications through LexisNexis, CGM, Internal Compliance, Coverage, and Address Checks.



To preserve the integrity of the program and to prevent fraud, waste, and abuse, the consumer will be required to submit PII twice for the purposes of service providers submitting information to NLAD, consumer communication, marketing and advertising purposes.

NO API OPENS THE DOOR FOR PHISHING SITES



Without existing competitive ad traffic, these sites can and will rise to the top of Google

FAKE LIFELINE SITES EXIST AND WILL RISE IN SEARCH RESULTS PAGES

Providers will be unable to advertise if the main intent is to send users to a different website (this violates Google's Bridge Page Policy). This system opens the door for phishing websites to impersonate Lifeline providers and maliciously collect data.

NV COULD CREATE CARRIER-ASSISTED LIFELINE SIGNUP FOR ONLINE ENROLLMENT PARALLEL TO AGENT PROCESS

NV SERVICE PROVIDER LIFELINE SIGNUP WITH AGENT

- Consumer meets Agent
- Agent signs into NV Agent Portal
- Consumer provides full name, address, DOB, last 4 SSN to Agent to complete USAC online form.
- Consumer reviews and clicks consent when handed tablet by Agent.
- Consumer lists for agent all qualifying programs that she participates in. Agent checks boxes on USAC form.
- Consumer initials certifications and signs USAC online form when handed tablet by Agent.
- If Consumer needs to provide additional information to verify identity and eligibility, Agent helps consumer understand what is needed and can collect documentation from the consumer to upload to USAC.
- Once Consumer is verified, Agent can complete carrier's enrollment process.

NV SERVICE PROVIDER LIFELINE SIGNUP ONLINE

- Consumer reaches Service Provider online.
- Consumer provides full name, address, DOB, last 4 SSN to Service Provider – same info as on USAC online form.
- Consumer reviews and clicks consent to provide info to USAC. Service Provider provides identity info to USAC via API.
- Consumer checks all qualifying programs on Service Provider website – same as on USAC online form. Service Provider provides info to USAC via API.
- Consumer initials certifications and signs USAC online form linked by Service Provider.
- If Consumer needs to provide additional information to verify identity and eligibility, Service Provider helps consumer understand what is needed, and can collect documentation from the consumer to upload to USAC.
- Once Consumer is verified, Service Provider can complete the enrollment process.

THE NV WILL MAINTAIN CONTROL OF THE SIGNATORY PROCESS THROUGH API

TOOLS EXIST TO RETAIN THE INTEGRITY AND SECURITY OF VIRTUAL SIGNATURES ON USAC CERTIFICATIONS THROUGH SERVICE PROVIDER'S WEBSITE.



ADOBE document cloud
(pdf Service & Adobe Sign)
Authorized: 05/14/2018



DocuSign - DocuSign Federal
Authorized: 08/10/2017
Agencies using this service
Federal Communications Commission



VASCO - eSignLive
E-Signature and Digital Signature
Service by Project Hosts
Authorized: 08/30/2016



The user will complete the Lifeline application on the Service Provider website, then be redirected to the NV for attestation, a model similar merchant payments 3D secure which is commonly used by PayPal payments and also Verified by Visa And MasterCard SecureCode. Once complete, user will be redirected back to Service Provider website for results of accepted attestations or not.

<http://www.businessinsider.com/docusign-electronic-signature-certified-federal-technology-provider-2017-8>

The Electronic Signatures in Global and National Commerce Act (ESIGN, Pub.L. 106-229, 114 Stat. 464, enacted June 30, 2000, 15 U.S.C. Although every state has at least one law pertaining to electronic signatures, it is the federal law that lays out the guidelines for electronic signatures

NV WITH API WORKS BETTER FOR USAC & CONSUMER



1,705,000

MONTHLY NUMBER OF PEOPLE WHO
CALL Q LINK CUSTOMER SERVICE
THAT'S 55,000 EVERYDAY



167,705,397

NUMBER OF SUPPORT EMAILS Q LINK HAS SENT
These are calls and issues that USAC would
have to address without an API



58% of the 24M

DOCUMENTS CUSTOMERS SUBMIT
are improper and unusable

34,117,332

TOTAL LEADS

894,820

APPLICATIONS COMPLETED

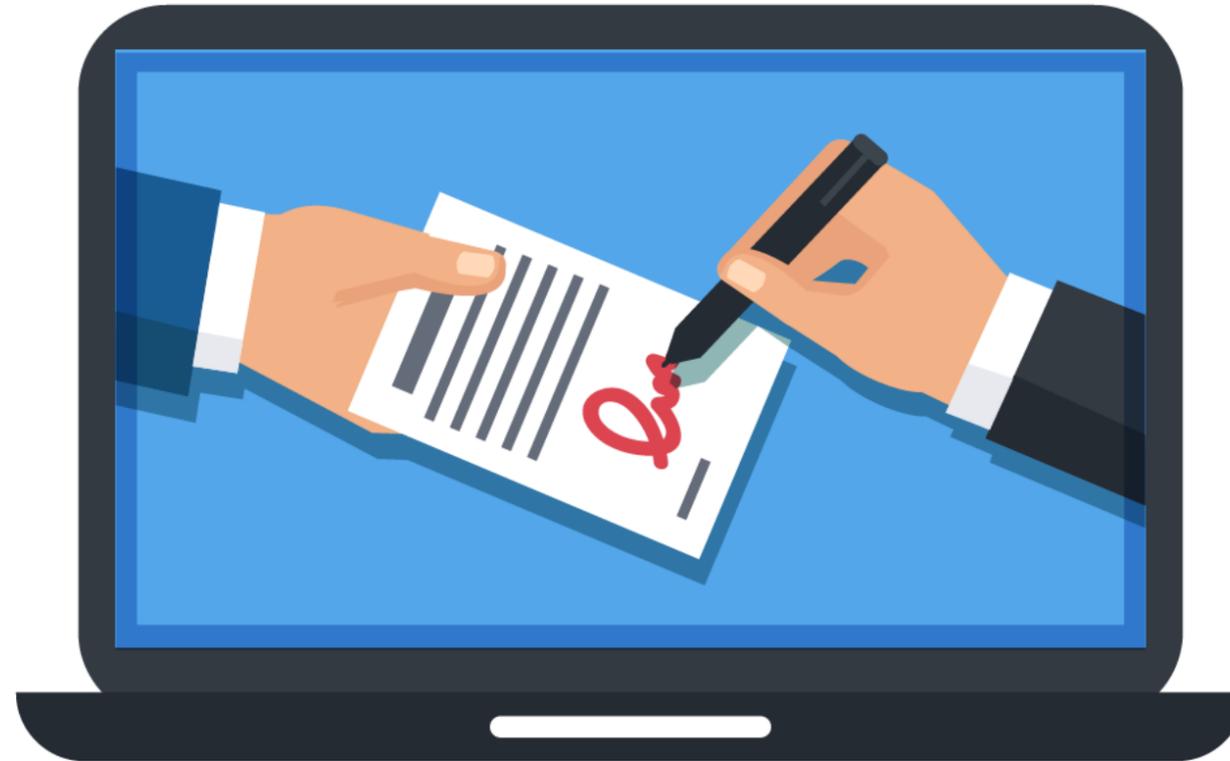
855,096

SENT TO NLAD

Q Link Wireless filtered
33,262,236 Ineligible leads

API-FACILITATED CARRIER-ASSISTED ENROLLMENT PROCESS

REDUCES OPPORTUNITIES FOR FRAUD



FEWER HUMAN TOUCHPOINTS TO ALLOW FOR FRAUD

USAC conducts all eligibility and identity verifications, including consumer initials and signatures, directly from the consumer because the consumer is the only one who can input them.

This is unlike the agent process which relies on the agent's good faith to have the consumer sign and not sign in lieu of the consumer.

Q Link Wireless Supplemental Information

Summary

The National Verifier with API allows Lifeline Service Providers a secure and streamlined method to assist millions of Lifeline applicants with online enrollment, quickly and efficiently address the many complicated issues that arise throughout eligibility verification, and submit only pre-screened and accurately completed Lifeline applications for USAC approval.

Key Messages

1. *Online enrollment is vital to serving rural America, veterans, disabled, and the elderly, and to providing multi-language support.*

Q Link Wireless is the number one Lifeline provider of rural America.

67% of Q Link customers live in rural areas, which the FCC defines as “any area with a total population under 25,000”.

There are no street agents to service these areas or assist in sign up, which means they require a streamlined online enrollment process to participate in Lifeline.

- There are 10 states that have *at least* 20,000 rural Q Link households.
- They would all remain excluded from Lifeline services without an online process with API to allow Service Provider assistance.

82% of Q Link customers are new to the Lifeline Program, and have never been through the eligibility process before. Without the ability to reach out to Service Providers to answer questions or provide assistance, they may not be able to complete the sign up process.

The US has a Hispanic population of 57.5 million as of July 1, 2016, which constitutes 17.8% of the total US population.

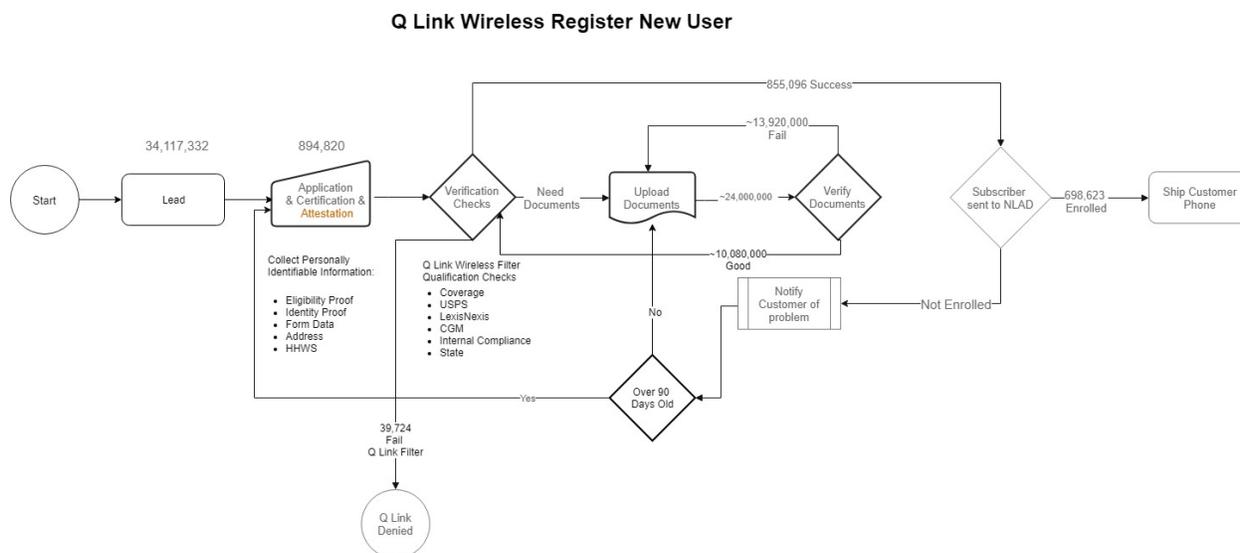
<https://www.census.gov/newsroom/facts-for-features/2017/hispanic-heritage.html>

- Lifeline Service Providers can offer Spanish language websites, IVRs, and sign up processes that don't exclude Spanish-speaking Americans from Lifeline services.
- Even if the National Verifier were able to launch Spanish-language support in a couple of years, hundreds of thousands of Americans would still be unable to sign up in the meantime.

Q Link Wireless currently serves 2 million households, and 100% of them signed up online.

2. The eligibility verification process is important, but should not be a barrier to prevent enrollment from otherwise eligible users. A complicated process will be difficult for many consumers to navigate, especially if they are not validated through automated database checks.

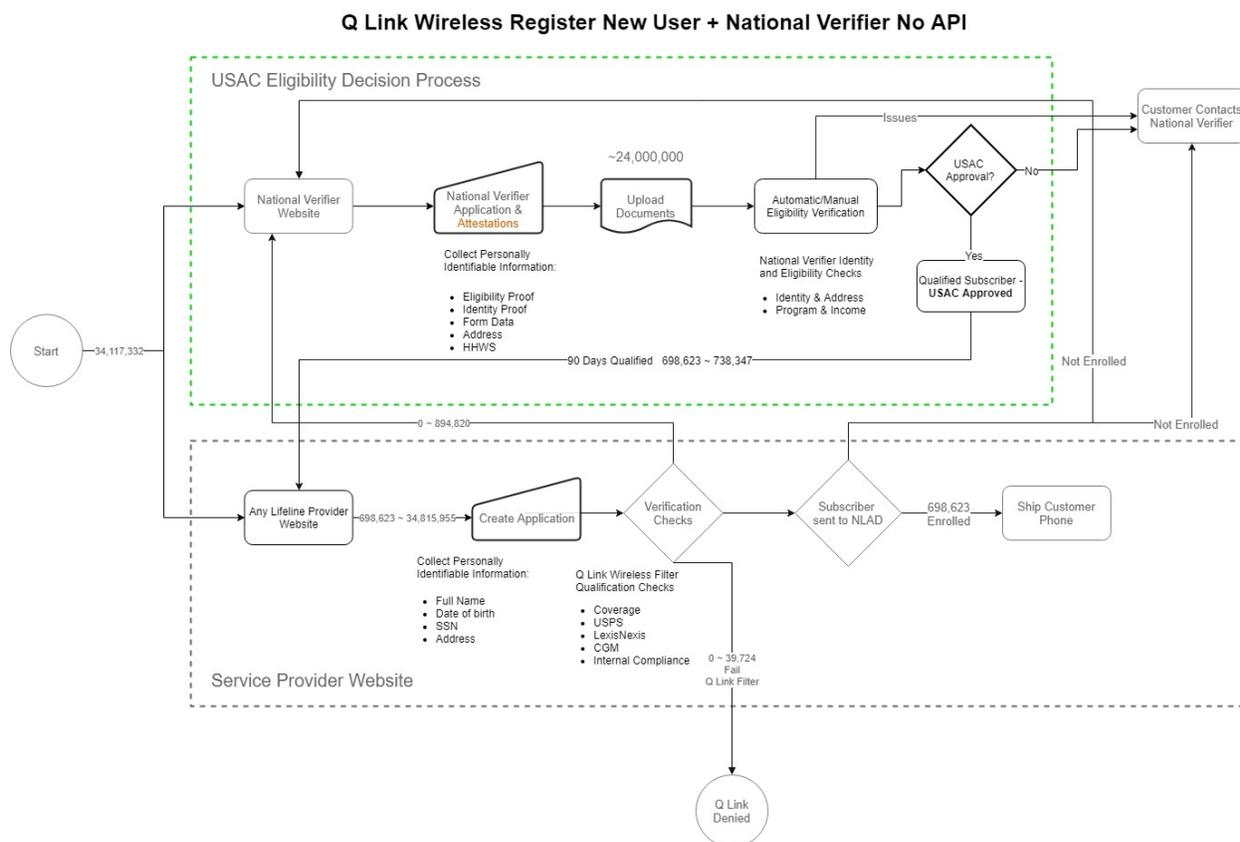
Figure 1: Current Q Link Wireless Subscriber Registration



- **Q Link's current registration and verification process, (Figure 1), is similar to the proposed solution of the National Verifier with API.**
The National Verifier will replace Q Link's current verification process, with USAC as the final authority to determine an applicant's Lifeline eligibility.
- Q Link's process was designed to be simple for the applicant, following guidelines recommended by the government's usability.org, which is focused on user experience.¹
- 34 million leads come straight to Q Link Wireless, and result in 700K applicants enrolled in Lifeline with our assistance throughout the process.

¹ <https://www.usability.gov/what-and-why/user-experience.html>

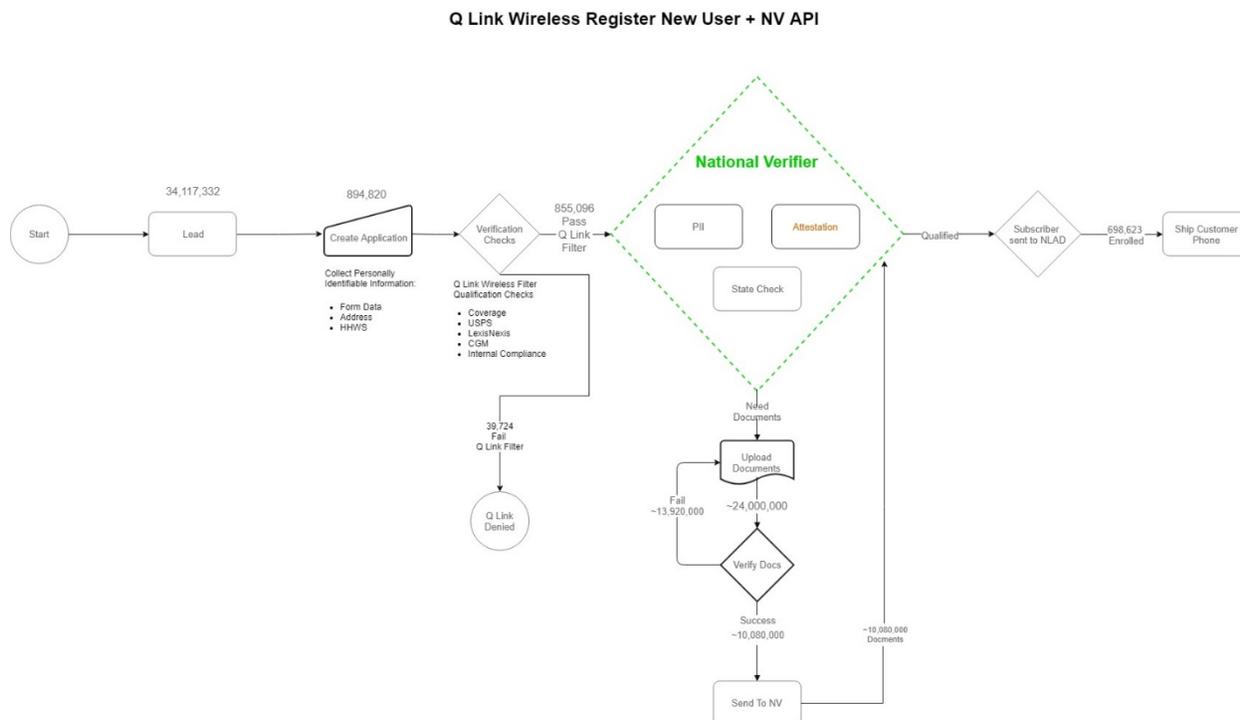
Figure 2: National Verifier No API



- **Applicant registration with no API, (Figure 2), demonstrates a clearly complex, multi-step process with duplication of work for the applicant, the National Verifier, and the Service Provider.**
- Every application flows to the National Verifier, where the user enters Personally Identifiable Information and proof documents.
If any questions arise during the registration process, USAC will have to support these inquiries.
 - Q Link Wireless receives ~1.7 million calls, ~12 million emails, and ~15,000 social media interactions, to resolve customer inquiries per month.
- If the user is approved as eligible through the National Verifier, he or she must return to the Service Provider website and re-enter his or her personally identifiable information for NLAD.
 - Many users are hesitant to enter sensitive information online, let alone twice.
- This process is convoluted for all parties involved, with duplication of work across all channels.
- USAC would inherit approximately 38 times more work that the Service Provider would normally handle.

- This includes filtering applications through LexisNexis, CGM, Internal Compliance, Coverage, and Address checks through USPS.

Figure 3: National Verifier + API



- **Applicant registration with API, (Figure 3), demonstrates a simple registration process for Lifeline that does not duplicate work for the applicant, USAC, and the Service Provider. It leaves the Lifeline eligibility decision to USAC.**
- Personally Identifiable Information is collected through the Service Provider website, and then run through verification checks for Coverage, Address, LexisNexis, CGM, and Internal Compliance to filter out invalid or incomplete applications. *The applications that make it past the Q Link verification filter are only ~2.5% of total applications, which we would then forward to USAC for the final qualification decision.*
- If any proofs are required by the user, Q Link notifies the applicant to upload them. They are verified through Q Link’s internal compliance department, then sent to USAC. *Q Link processes about 24 million documents annually, of which 58% are invalid.*
- This process enables the Service Provider to support customer inquiries throughout the registration process. Q Link receives ~1.7 million calls, ~12 million emails, and ~15,000 social media interactions to resolve customer inquiries per month.
- A streamlined process such as the one outlined above reduces work for the National Verifier by a factor of 38 times. This enables a clear and consistent communication channel, and a positive user experience for the applicant.
- Ajit Pai said “curtail the waste, fraud, and abuse that continue to plague the Lifeline program and (2) make Lifeline more effective at bridging the digital divide on behalf of

low-income Americans”² – the proposed process of registration with API fully supports this goal.

Moving online users back and forth between the National Verifier and Lifeline Service Provider has many negative consequences.

- It reduces the credibility of both the National Verifier and Lifeline Service Provider as the “main” source for Lifeline.
- The user is given multiple “finish” points on the different websites, and will have difficulty knowing when they have actually completed the process.
- Submitting personal information, such as a Social Security Number, makes people nervous, especially if they’re asked multiple times in different places. This could cause users to refrain from applying out of skepticism.
- It increases the application processing time, as the user must wait for approval from both the National Verifier and the Lifeline Service Provider.
- Two sign up points mean increased likelihood of data entry errors, causing further delays and confusion.
- Two sign up processes, through the National Verifier and Lifeline Service Provider, increase the user’s workload.
 - In defiance of <https://webstandards.hhs.gov/guidelines/15>

Since Service Providers would have no visibility of the sign up process, they will be unable to provide assistance or information to users. This is a burden that USAC would have to take on, but an API would allow Service Providers to easily take on that role.

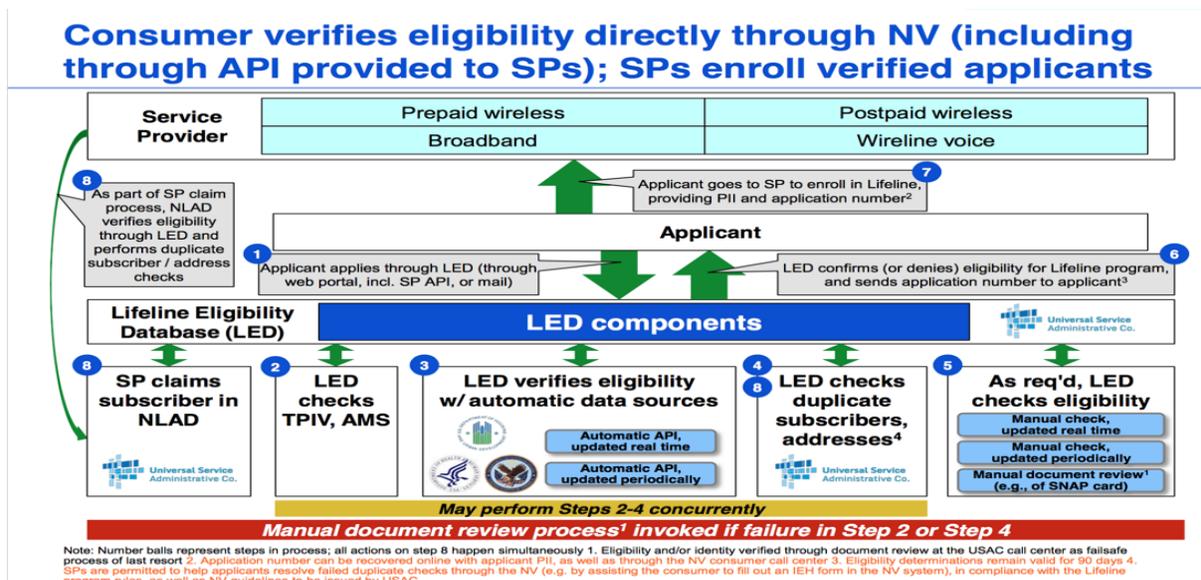
² *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Telecommunications Service Providers Eligible for Universal Service Support*, WC Docket No. 09-197.

3. The FCC/USAC have recognized that an online eligibility process is important to have.

In October 2016, the National Verifier plan fully supported online enrollment via Service Providers using API.

See Figure 4 below.

Figure 4: National Verifier Published Schematic



Issues the National Verifier will be unable to provide assistance with when customers mistakenly call them:

How can I keep my current phone number?

How many minutes do I get?

Do you offer data as well?

Can I use my phone nationwide?

What services are included, do I have call waiting and caller ID?

When do I receive my free minutes every month?

What should I do if I lost my phone?

What happens if I go over my minutes?

Are the phones insured?

Can I use my SIM card in your phone?

What is the recertification process?

Where do I get a user manual for my phone?

What if I need to access additional services, such as texting or international calling?

Will I be able to roam?

Which phones offer special services for the hearing, vision and speech-impaired?

What should I do if my monthly services aren't refilled for the new month?
 Do you have a coverage map?
 Can you tell me what kind of service I will receive from your company in my area?

Issues Lifeline Service Providers will be unable to provide assistance with when customers mistakenly call them:

How do I know you received my proof documents?
 What is my order status?
 What proof documents am I still missing?
 Can you add consent to my application through an interpreter, as I am disabled?
 Why are documents being denied?
 How long does this process take before I receive my phone?
 Can you walk me through submitting my proof documents?

4. Service Provider assistance is very important to successful consumer navigation of the eligibility process.

Customers will only need to deal with one entity, their Lifeline Service Provider, in all stages of the application process. They will know exactly who to call for help.

Lifeline Service Providers can assist the applicant to provide valid documentation for USAC to review and provide customers direct eligibility and status information.

With API, consumers will enjoy a streamlined application process that is easy to understand and does not create unnecessary barriers to entry for Americans that live in rural areas, are elderly, disabled, or not English speaking.

5. Including an API will support Service Provider assistance for online enrollment, without introducing fraud risks.

The National Verifier with API favors online retailers using secure APIs, as opposed to street agents, which are known for instances of fraud and abuse.

By allowing automated systems of machine-to-machine communication to aid the applicant process, there are fewer human touch points. The applicant deals directly with one website, not multiple with intermediaries.

An online applicant registration process utilizing National Verifier API means Service Providers can guarantee no party other than the applicant is providing attestations, or is in any other way involved.

Without APIs, the National Verifier will open the door for phishing sites. Providers will be unable to advertise if the main intent is to send users to a different website, which violates Google's Bridge Page Policy. This result would open the door for malicious phishing websites to collect data acting as Lifeline providers.

The National Verifier will maintain control of the signatory process through API.

There are many tools that are endorsed by the Federal Government to retain the integrity and security of virtual signatures on USAC certifications through a Service Provider's website.

*DocuSign was authorized by the FCC on 8/10/2017 as a secure means for compliance with The Federal E Sign act of 2000**. DocuSign provides locking in documents for signatures to present to the person that needs to sign the document. National Verifier, in real time, can edit and render the document that National Verifier wants the consumer to execute at any time, allowing full control of the content document used for attestations that is accessed by the providers through the API presenting to customers.

The user completes a Lifeline application on the Service Provider website, then is redirected to the National Verifier for attestation, a model similar merchant payments handled using 3D Secure. This model is commonly used for PayPal payments, and is verified by Visa and MasterCard SecureCode. Once complete, the user will be redirected back to the Service Provider website for results of the attestations.

As far as the user is aware (and is required to do), they only have to physically navigate to the Service Provider's website. The automatic redirection reduces the user's workload, while still keeping the secure signatory process in control of the National Verifier.

*The Electronic Signatures in Global and National Commerce Act (ESIGN, Pub.L. 106-229, 114 Stat. 464, enacted June 30, 2000, 15 U.S.C.).

Although every state has at least one law pertaining to electronic signatures, it is the *federal* law that lays out the guidelines for electronic signatures:

(e) Effect on State and Federal law. E-SIGN preempts most State and Federal statutes or regulations, including the Farm Credit Act of 1971, as amended (Act), and its implementing regulations, that require contracts or other business, consumer, or commercial records to be written, signed, or in non-electronic form. Under E-SIGN, an electronic record or signature generally satisfies any provision of the Act, or its implementing regulations that requires such records and signatures to be written, signed, or in paper form. Therefore, unless an exception applies or a necessary condition under E-SIGN has not been met, an electronic record or signature satisfies any applicable provision of the Act or its implementing regulations.

6. The National Verifier with API works more efficiently for both USAC and the consumer.

An API will allow Service Providers to filter through applications and documentations, and check for data entry errors, invalid or incomplete information, and other common errors, for USAC.

- 24 million documents are submitted to Q Link annually, and 58% of them are invalid and unusable.

The most efficient system allows USAC to use all of their time and resources on only pre-screened Lifeline applications, while Service Providers deal with customer issues and application corrections. This is achieved through API.

Customers will avoid wasting time calling the wrong entity (the National Verifier or Lifeline Service Provider) for their questions, as they will know that their Lifeline Service Provider will be able to assist with inquiries.

Lifeline Service Providers will be able to assist customers with the sign up process, and field the many questions and complications that arise (documentation issues, questions about monthly service, confusion about eligibility requirements).

USAC will not waste resources fielding questions they cannot answer, because many users who sign up directly through the National Verifier will think the National Verifier is the source for all things Lifeline.

Consider the amount of time and manpower that will be wasted by *both* Lifeline Service Providers and the National Verifier telling callers, “we’re sorry, we can’t help you with this today. Please call [the National Verifier or your Lifeline Service Provider]”.

The National Verifier with API means Lifeline Service Providers can field ALL questions about their specific service, as well as an applicant’s sign up questions.

7. Having an API is simple to execute, and implementing it will create minimal work for USAC of only 100 hours.

The National Verifier is already implementing API integrations with State Databases and Government Offices, for example the Department of Health and Human Services and USPS.

It is estimated to take only 100 hours of work to implement an API.

These 100 hours will automate tens of thousands of hours processing invalid documents and customer service requests, and millions of dollars in USAC resources.